

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

*October 13, 2021*

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

GERRON HALL,

Defendant.

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CRIMINAL NO.

(UNDER SEAL)

~~XXXXXXXXXX~~

**4:21-CR-491**

**INFORMATION**

THE UNITED STATES CHARGES:

**Introduction**

At all times material to this Information:

1. The Houston Independent School District ("HISD") was a public entity providing elementary through high school education for students in Houston, Texas. HISD was governed by a Superintendent and a Board of Education consisting of nine elected Trustees. HISD received directly and indirectly through the Texas Education Agency approximately \$300 million per year in federal program funds and grants from the United States Department of Education and other federal agencies. The administration of HISD included a Chief Operating Officer (COO) who managed various departments within HISD, including Construction Services and Facilities Services. Within Facilities Services was the Facilities Maintenance and Operations group.

2. BUSINESSMAN 1, operating as COMPANY 1 and COMPANY 2, obtained contracts and purchase orders from HISD to provide grounds maintenance, landscaping, construction, and repair services to HISD properties.

3. GERRON HALL ("HALL") worked within the HISD Facilities Maintenance and Operations Group and was the HISD Area Manager for Maintenance (South).

**COUNT ONE**

**(18 U.S.C. § 371 – Conspiracy)**

4. Beginning in or around 2011 and continuing through in or around 2020, in the Southern District of Texas and elsewhere, the Defendant,

**GERRON HALL,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly conspire, confederate, and agree with others known and unknown to the United States, including BUSINESSMAN 1, to commit offenses against the United States, that is:

- a. to corruptly give, offer, and agree to give anything of value to any person, with intent to influence and reward an agent of an organization and local government that receives more than \$10,000 in federal assistance in any one-year period, in connection with any business, transaction, and series of transactions of such organization and local government involving anything of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(2);
- b. being an agent of an organization and local government that receives, in any one-year period, benefits in excess of \$10,000 under a federal assistance program, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept, anything of value from any person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such organization and local government involving anything of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(1)(B).

**Manner and Means of the Conspiracy**

It was part of the conspiracy that:

5. BUSINESSMAN 1, through COMPANY 1 and COMPANY 2, obtained purchase orders for construction, repair, landscaping, and maintenance jobs at HISD schools and other HISD properties. BUSINESSMAN 1 obtained these jobs by paying cash bribes or kickbacks to HISD personnel, including HALL and others, who assisted him in obtaining or retaining business with HISD.

6. Specifically, in return for bribe payments from BUSINESSMAN 1, HALL helped award, or refrained from interfering in the award of, HISD jobs to BUSINESSMAN 1, despite misgivings HALL had about the excessive award of jobs to BUSINESSMAN 1, who charged comparatively high prices.

7. In 2017, BUSINESSMAN 1 maintained a bribe ledger in which he tracked the bribe payments he made in exchange for assistance with securing particular purchase orders. In the ledger, BUSINESSMAN 1 typically listed the HISD schools where his companies COMPANY 1 and COMPANY 2 did construction, repair, grounds maintenance, or landscaping work; the type of work; the amount of the invoice paid by HISD for the work; the amount of the bribe that he paid; the identity of the bribe recipient (identified by initials or first name); the date the bribe was paid; and, at times, the location at which the bribe was paid, such as at local restaurants or schools or while on trips to Las Vegas with the bribe recipients.

8. In the bribe ledger, BUSINESSMAN 1 tracked his bribe payments to HALL.

**Overt Acts of the Conspiracy**

In furtherance of the conspiracy and to achieve the objects thereof, at least one of the co-conspirators committed or caused to be committed, in the Southern District of Texas and elsewhere, at least one of the following overt acts, among others:

9. On or about November 7, 2017, BUSINESSMAN 1 paid HALL approximately \$10,000 at Mandarin Immersion Magnet School related to projects at Bonner Elementary School, Franklin Elementary School, and DeZavala Elementary School.

10. On or about November 27, 2017, BUSINESSMAN 1 paid HALL approximately \$7,500 at The Rice School related to projects at Cage Elementary School, Poe Elementary School, and Davila Elementary School.

11. On or about December 12, 2017, BUSINESSMAN 1 paid HALL approximately \$20,000 at 4241 Purdue St. related to projects at J. P. Cornelius Elementary School and Las Americas Newcomer School.

12. On or about January 11, 2018, BUSINESSMAN 1 paid HALL approximately \$20,000 at Lamar High School related to projects at Gross Elementary School and The Rice School.

All in violation of Title 18, United States Code, Section 371.

**NOTICE OF FORFEITURE**

**(18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c))**

13. Pursuant to Title 18, United States Code, Section 981(a)(1)(C), through application of Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

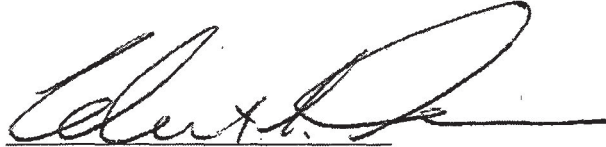
**GERRON HALL,**

that upon conviction of Count One, all property, real or personal, which constitutes or is derived from proceeds traceable to such offense, is subject to forfeiture.

**Money Judgment and Substitute Assets**

14. The United States gives notice that it will seek a money judgment against the Defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the Defendant in substitution.

JENNIFER B. LOWERY  
ACTING UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Robert S. Johnson', written over a horizontal line.

Robert S. Johnson  
Assistant United States Attorney